

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF RHODE ISLAND**

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In re: MICROFIBRES, INC. :
Bk. No. 16-10154
DAWN PHILLIPS and CEDRIC WILLIAMS : Chapter 7
on behalf of themselves and all others similarly
situated, :
Plaintiffs, : A.P. No.16-01002
:
MICROFIBRES, INC., :
:
Debtor
----- X

**PLAINTIFFS' MOTION FOR (A) CLASS CERTIFICATION, (B) APPOINTMENT OF
CLASS REPRESENTATIVES, (C) APPOINTMENT OF CLASS COUNSEL, (D)
APPROVAL OF THE FORM AND MANNER OF CLASS NOTICE, AND (E) SUCH
OTHER AND FURTHER RELIEF AS THIS COURT MAY DEEM APPROPRIATE**

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if served by mail, any party against whom such paper has been served, or any other party who objects to the relief sought, shall serve and file an objection or other appropriate response to said paper with the Bankruptcy Court Clerk's Office, 380 Westminster Street, 6th Floor, Providence, RI 02903, (401) 626-3100. If no objection or other response is timely filed, the paper will be deemed unopposed and will be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interest of justice requires otherwise

Plaintiffs Dawn Phillips and Cedric Williams ("Plaintiffs") move this Honorable Court for an order: (a) certifying a class pursuant to the Fed. R. Bankr. P. 7023 and Fed. R. Civ. P. 23 comprised of the Plaintiffs and the 185 or so other similarly situated former employees of Microfibres, Inc. ("Debtor") who worked at or reported to either of the facilities located at 1 Moshassuck Street, Pawtucket, RI 02860 (the "RI Facility"); or at 3821 Kimwell Drive, Winston-Salem NC 27114 (the "NC Facility") (collectively the "Facilities") and were terminated, without cause on their part, on or about January 28, 2016, within thirty days of that

date or thereafter, as part of, or as the reasonably expected consequence of, the plant closings ordered by the Debtor on or about January 28, 2016, who do not file a timely request to opt-out of the class (“Class”); (b) appointing Plaintiffs Dawn Phillips and Cedric Williams as Class Representatives; (c) appointing Lankenau & Miller, LLP, The Gardner Firm, P.C., and Gursky | Wiens as Class Counsel; (d) approving the form and manner of Notice to the Class; and (e) granting such other and further relief as this Court may deem proper.

In support hereof, Plaintiffs submit a memorandum of law, declarations of Plaintiffs and Plaintiffs’ counsel, a proposed class notice, and a proposed order.

Dated: May 26, 2016

Respectfully submitted,

ATTORNEYS FOR PLAINTIFFS

/s/ Mary E. Olsen

Mary E. Olsen
The Gardner Firm, P.C.
210 South Washington Ave.
P.O. Drawer 3103
Mobile, AL 36652
Telephone: (251) 433-8100
Facsimile: (251) 433-8181
Email: molsen@thegardnerfirm.com

Stuart J. Miller
LANKENAU & MILLER, LLP
132 Nassau Street, Suite 1100
New York, NY 10038
Telephone: (212) 581-5005
Facsimile: (212) 581-2122
Email: sjm@lankmill.com

/s/ Evan Shanley

Marc Gursky, Esq. (#2818)
Evan Shanley, Esq. (#8922)
GURSKY | WIENS
420 Scrabbletown Rd., Ste. C
North Kingstown, R.I. 02852
Telephone: (401) 294-4700
Facsimile (401) 294-4702

Email: mgursky@rilaborlaw.com
Email: eshanley@rilaborlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of May, 2016, I filed the forgoing with the Court via CM/ECF thereby causing service on counsel of record including:

Gardner H. Palmer, Jr. (#3707)
DiOrio Law Office
144 Westminster Street, Suite 302
Providence, RI 02903

/s/Mary E. Olsen
Attorney for Plaintiffs